

EXHIBIT 6

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

Case No.

UBER TECHNOLOGIES, INC.;

3:17-cv-00939-WHA

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

_____/

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF SAMUEL W. LENIUS

PALO ALTO, CALIFORNIA

FRIDAY, JULY 28, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2664643

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1 to any individual employee as to whether or not they 17:45
2 should or should not have access. 17:45

3 Q Can you review documents on the SVN server 17:46
4 without downloading them? 17:46

5 MR. JAFFE: Objection; form. 17:46

6 THE WITNESS: This depends greatly on the 17:46
7 software configuration of the server. There are 17:46
8 software configurations of Subversion servers which 17:46
9 allow you to browse them directly through a web 17:46
10 browser with appropriate credentials and view the 17:46
11 files within your web browser. 17:46

12 I'm not qualified to say whether or not that 17:46
13 counts as downloading or what downloading means in 17:46
14 that context. 17:46

15 But, I can certainly imagine that there are 17:46
16 ways of browsing Subversion repositories, which do not 17:46
17 meet some legal definition of whatever is or is not 17:46
18 downloading. 17:46

19 MR. JENNINGS: Q. Does Waymo provide you 17:46
20 with work computers to use, or do you use personal 17:47
21 computers? 17:47

22 A Waymo provides us with Waymo, and the -- 17:47
23 previously, Google provided us with computers for use 17:47
24 at work. 17:47

25 Q Have you ever worked on a personal computer 17:47

1 to do work for Project Chauffeur or Waymo? 17:47

2 A I have used my phone for doing e-mails. I 17:47

3 have worked on personal computers for doing work. 17:47

4 Q Have you ever accessed SVN from a personal 17:47

5 computer? 17:47

6 A I have accessed SVN from a personal computer 17:47

7 using my credentials for Waymo. 17:47

8 Q Have you downloaded files from SVN on a 17:47

9 personal computer? 17:47

10 A I have downloaded files from SVN on a 17:47

11 personal computer. 17:47

12 Q Are you aware of other people at Waymo 17:47

13 downloading files from a personal computer? 17:47

14 A I'm not aware of others at Waymo who may or 17:47

15 may not have downloaded personal files on a -- excuse 17:47

16 me -- files on a personal computer. 17:48

17 Q I want to change subjects and talk about the 17:48

18 '936 patent very briefly. 17:48

19 Going back specifically to some of your 17:48

20 testimony, I believe you talked about how, in relation 17:48

21 to the '936 patent, you had read some academic papers 17:48

22 a long time ago about techniques for firing laser 17:48

23 diode circuits. 17:48

24 Do you remember this testimony? 17:48

25 A I do. 17:48

1 mind. 17:52

2 The -- I can remember attending a meeting at 17:52

3 Mr. Levandowski's -- I don't know if it was his home 17:52

4 or not -- a house in Palo Alto where a company was 17:52

5 discussed. I believe this is prior to me receiving a 17:52

6 written offer from 280 Systems. 17:52

7 Q And, were there other people there other than 17:52

8 you and Mr. Levandowski? 17:52

9 A I recall other people being there, yes. 17:52

10 Q About how many other people? 17:52

11 A Difficult to give a count. More than ten, 17:52

12 less than 30, maybe. 17:52

13 Q Did you recognize the people that were there? 17:52

14 A I did. 17:52

15 Q Were they your co-workers from Waymo? 17:53

16 A Some of them were colleagues at Waymo. 17:53

17 Q Now, you said you sometimes did work on 17:53

18 Project Chauffeur on your personal computer; is that 17:53

19 right? 17:53

20 A That's true. 17:53

21 Q Did you ever do work on Project Chauffeur 17:53

22 from home? 17:53

23 A Yes. 17:53

24 Q And, did you access SVN while you were at 17:53

25 home? 17:53

1 A Yes I did.

17:53

2 Q On your personal computer? 17:53

3 A Yes, I did. 17:53

4 Q And on your work computer? 17:53

5 A Yes.

17:53

6 Q So, it was a laptop? 17:53

7	A So, my personal computer is a desktop. My	17:53
8	work -- I have multiple work computers, one of which	17:53
9	is Linux, one of which is Mac laptop, one of which is	17:53
10	a Windows desktop.	17:53

11 MR. JENNINGS: I don't have anymore 17:54

12 questions. 17:54

13 MR. JAFFE: I just have a couple of brief 17:54

14 questions for you. 17:54

15 EXAMINATION 17:54

16 BY MR. JAFFE: 17:54

17	Q	Does Waymo and Project Chauffeur before	17:54
18		that -- do you know whether they keep their LiDAR	17:54
19		designs confidential?	17:54

[illegible]

22 Q I mean, they don't show them to other people. 17:54

23 A "Other people" being unauthorized parties, 17:54
24 that would be correct, in that only authorized parties 17:54
25 will view the -- the deep working internals of our 17:54

CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

That before completion of the deposition, review of the transcript [x] was [] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

Dated: 7/29/2017



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